

Richard F. Celeste Governor

Southwest District Office 7 East Fourth Street Dayton, Ohio 45402-2086 (513) 449-6357

April 13, 1987

RE: SKINNER LANDFILL BUTLER COUNTY

CERCLA CORRESPONDENCE FILE

Mr. Gene Wong, 5HR-11 USEPA, Region V 230 S. Dearborn Street Chicago, IL 60604

Dear Mr. Wong:

This letter is to provide you with what Ohio EPA feels is necessary as part of a phase II RI effort at the Skinner Landfill Superfund site in Butler County, Ohio. Recommendations for further RI activities were provided by your consultant, Roy F. Weston, Inc. in Section 7 of the draft RI report dated March 3, 1987.

Based upon Ohio EPA review of that report, the Agency feels the following areas need to be addressed as part of the phase II RI:

- The leachate seep itself (SD-12) should be resampled in addition to the soils in the area around the seep that Weston proposes to sample.
- 2. A minimum of two (2) surface soil samples should be obtained to determine background conditions at the site. These samples should be preferably obtained off-site in upland areas relative to the Skinner landfill and away from the railroad tracks that are to the east of the site.
- 3. No background water or sediment sample was obtained from Skinner Creek during the phase I RI activities. A water and sediment sample <u>must</u> be taken from Skinner Creek at a point upstream of the site to determine background conditions.
- 4. An additional round of samples should be obtained from all site monitoring wells once the new wells have been installed. It has been almost one (1) year since the last ground water sampling event. Furthermore, some of the previous results are questionable due to apparent poor decontamination techniques as evidenced by field blanks which contained significant amounts of organic compounds. Because of Mr. Skinner's landfilling operations, several of the existing wells are in jeopardy of being damaged or buried in the future and therefore samples should be taken while their integrity lasts.

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- 5. All newly installed monitoring wells should have their screens entirely within the bedrock or entirely within the unconsolidated sand and gravel above the bedrock. Individual wells should not be screened across both formations as was done on several previously installed wells.
- 6. All samples obtained (ground water, surface water, sediments, soils) should be analyzed for the complete CLP list of organics and inorganics including specific conductance and pH (water samples).

Please send a copy of the draft work plan and QAPP for the phase II RI to Ohio EPA for our review and comment. Since various personnel from this district office will be present for portions of future site work, I would also appreicate your sending me a copy of the site Health and Safety Plan.

I plan to submit specific Ohio EPA comments on the remaining portions of the RI report to you by May 8, 1987, as you requested. Please contact me if you have any questions or would like to discuss any of the phase II RI activities in more detail.

Sincerely,

Michael J. Starkey
Michael J. Starkey

District Unregulated Sites Group Leader Division of Solid and Hazardous Waste Management

MJS/bjb

cc: Roger Hannahs, DSHWM, CO Cathi Watkins, DWQMA, SWDO